

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Kimberly A. Bocelli
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association as Trustee of Cabana
Series V Trust
v.

Mario Bocelli A/K/A Mario J. Bocelli
Kimberly A. Bocelli
ROBERT W. SEITZER
Respondents

CASE NO.: 24-13859-amc

CHAPTER 7

Judge: Ashely M. Chan

Hearing Date: December 18, 2024, at 12:30PM

Objection Deadline: December 3, 2024

**DECLARATION IN SUPPORT OF MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

I, Sarah Wasson, certify the following to be true under penalty of perjury:

1. I am employed as a Bankruptcy Asset Manager for SN Servicing Corporation as servicer for U.S. Bank Trust National Association as Trustee of Cabana Series V Trust (the “Movant”) and am authorized to execute this declaration on behalf of Movant. This declaration is offered in support of the Motion for Relief from the Automatic Stay annexed hereto.

2. In my capacity as Bankruptcy Asset Manager, I have access to Movant’s business records, including the business records for and relating to the loan of the Debtor, Kimberly A. Bocelli, secured by the real property known as 2714 South Smedley Street, Philadelphia, PA 19145 (the “Property”). The facts stated in this declaration are based upon information that I have obtained by reviewing records maintained in the ordinary course of business, as part of regularly conducted business activity, by or from information transmitted by person(s) with knowledge of the events described therein, at or near the time of the event described.

3. According to business records, Kimberly Anne Bocelli and Mario J. Bocelli executed and delivered a Note dated March 15, 2007, in favor of Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co of Pennsylvania (the "Original Lender"), in the original principal amount of \$282,332.00. The Note is secured by a Mortgage executed and delivered by Kimberly Anne Bocelli and Mario J. Bocelli to Original Lender.

4. The loan remains contractually due for the April 20, 2020, payment and interest continues to accrue each month that the loan remains delinquent.

5. As of November 13, 2024, the following amounts are due on the instant loan:

I. PAYOFF STATEMENT

Unpaid Principal Balance:	\$265,397.10
Accrued Interest (to 11/13/2024):	\$100,886.50
Late Charges:	\$796.14
Attorney's Fees & Costs:	\$3,225.32
Forbearance Principal:	\$108,063.79
Corporate Advance:	\$1,271.40
Tax Advance:	\$21,990.6
Sub-Total of Advances:	\$0.00
Recoverable Balance:	\$0.00
Suspense Balance:	(\$500.00)
TOTAL DUE AS OF 11/13/2024:	\$501,130.85

II. EQUITY ANALYSIS

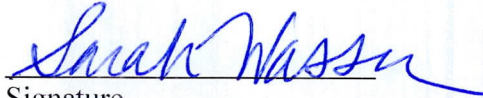
Estimated Fair Market Value of Real Estate as of Bankruptcy Filing (10/29/2024):	\$236,320.00
Source:	Debtor's Schedule D
Liens on the Real Estate:	

First Mortgage (Principal & Interest) as of (DATE) \$501,130.85

TOTAL LIENS:	\$501,130.85
APPARENT EQUITY AS OF 11/13/2024:	\$0.00

6. I certify under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of November, 2024.



Signature

Sarah Wasson

Name

Bankruptcy Asset Manager

Title